DRAFT
Proposed Administrative Order on Consent
Red Hill Bulk Fuel Storage Facility
Pearl Harbor, Oahu
Hawaii DOH, US EPA, US Navy, and DLA

COMMUNICATION STRATEGY

Projected Action Date:	September 29, 2015
Location:	DOH, Honolulu EPA R9, San Francisco
Level of Public Interest:	High
DOH Lead:	Steven Chang, Solid and Hazardous Waste Branch Roxanne Kwan, UST Section
DOH Media Contact:	Janice Okubo/Keith Kawaoka
EPA Program Lead:	Steven Linder – UST Office Rebecca Sugerman - ORC
EPA Media Officer:	Dean Higuchi, 808-541-2711
EPA Congressional Liaison:	Dean Higuchi, 808-541-2711
Navy/DLA Lead:	Tom Clements

Action Description:

This final administrative order on consent (AOC) provides for the performance by Navy and Defense Logistics Agency (DLA) of a release assessment, response(s) to release(s), and actions to minimize the threat of future releases in connection with the field constructed underground bulk fuel storage tank systems and associated piping at the Red Hill Bulk Fuel Storage Facility ("Facility"), located near Pearl Harbor, on the island of Oahu in the State of Hawaii. Authorized representatives of the Navy, DLA, the Hawaii Department of Health (DOH) and the Environmental Protection Agency (EPA) have all signed the AOC as of September 28, 2015.

Issue Background:

On January 13, 2014, Navy discovered a loss of fuel from Tank #5 and immediately notified DOH and EPA. After transferring the fuel from Tank #5 to other storage tanks the Navy verbally notified DOH and EPA of a confirmed release from Tank #5. On January 23, 2014,

Navy provided written notification to DOH. Navy estimates the fuel loss at approximately 27,000 gallons. The total amount released to the environment is unknown.

In response to this fuel release, DOH, EPA, the Navy and DLA began negotiating a comprehensive approach to not only investigate and remediate the fuel released from Tank #5 but also to assess and improve the structural integrity of all 20 tanks at the Red Hill Facility. In general, a negotiated agreement such as this administrative order on consent is appropriate in instances where a regulated entity is willing to cooperate with the regulatory agencies to achieve the appropriate environmental goals, and Navy and DLA are willing to make improvements and work with the Regulatory Agencies. Therefore, a signed agreement among the parties with regulatory oversight is the fastest and most effective way to put an enforceable mechanism in place to protect groundwater resources in the vicinity of the Facility and ensure that the Facility is operated and maintained in an environmentally protective manner. The final Red Hill AOC is structured to establish a process for collecting the necessary data and evaluating the optimal technical solutions to address past fuel releases and prevent future releases.

The Navy and DLA originally signed the proposed AOC on May 29, 2015. DOH and EPA distributed the proposed AOC to the interested public through direct mailings, the placement of a public notice in the local newspaper, and through the DOH and EPA websites. We also provided a 50 day comment period and held a public meeting on June 18, 2015 in Honolulu to present the details of the proposed AOC to the public and to allow for oral comments on the proposal. DOH and EPA received over 140 written comments and 29 people presented oral testimony at the public meeting.

DOH and EPA reviewed all comments received and revised the AOC. The revisions address involvement of key stakeholders and the public; tank inspection, repair and maintenance procedures; the installation of additional groundwater monitoring wells; compliance with new Federal Underground Storage Tank Regulations; additional actions to reduce risks posed by the facility; and consideration of alternative fuel storage locations. In addition, the Navy and DLA committed to complete tank upgrades as soon as reasonably practicable. The final AOC has been signed by all parties and is effective as of September 28, 2015.

The Facility was constructed and became operational in the 1940s. The Facility includes twenty (20) field-constructed steel underground bulk fuel storage tanks ("Tanks"). The Tanks are constructed of steel, encased by an estimated minimum of 2.5 to 4 feet of concrete surrounded and supported by basalt bedrock. Each Tank has a fuel storage capacity ranging from approximately 12.5 to 12.7 million gallons resulting in a Facility-wide total of approximately 250 million gallons of fuel. At this time eighteen (18) tanks are active or in use and two (2) tanks are not currently in operation.

Agency Message:

The objective of the final AOC is to ensure that the groundwater resource in the vicinity of the Facility is protected and to ensure the operation and maintenance of the Facility in an environmentally protective manner. EPA and DOH look forward to continued work with the

Navy and DLA on this long term effort to address potential risks from this unique and complex Facility through a comprehensive solution to protect health and the environment.

Parties to the AOC:

- US Navy
- Defense Logistics Agency
- Hawaii Department of Health
- US EPA
- Hawaii Department of the Attorney General

Key Stakeholders:

- Honolulu Board of Water Supply
- Governor – State of Hawaii
- Mayor – City and County of Honolulu
- Honolulu City Council
- Hawaii Congressional Delegation
- Hawaii State Legislature
- State of Hawaii Residents

Communication Strategy

ACTION	Person Responsible
DOH Website on Red Hill Goes Live	Richard Takaba
EPA's Website on Red Hill Goes Live	Bonnie Barkett
Issue Press Release	Dean Higuchi
Call/Email Press Release to US Navy/DLA	
Email AOC/SOW/Press Release/Response to Comments Hawaii Governor David Ige Mayor Kirk Caldwell Honolulu City Council Hawaii Congressional Delegation Hawaii State Legislature Hawaii DLNR Honolulu BWS	

Q and A – AOC for Red Hill Bulk Fuel Storage Facility

Why did EPA and DOH negotiate an Administrative Order on Consent with the Navy?
A negotiated agreement such as an Administrative Order on Consent is appropriate, and the best enforcement tool to solve complex environmental problems since it allows for flexible and innovative solutions. The Administrative Order on Consent also goes beyond the scope of merely complying with the current regulations. The Red Hill Administrative Order on Consent is structured to establish a process for collecting the necessary data and evaluating the optimal technical solutions to address past fuel releases and prevent future releases.

Was the Administrative Order on Consent revised based on comments received from the public?
Yes, EPA and DOH made eight changes to the Administrative Order on Consent based on public comments. The changes address:

- Involvement of key stakeholders and subject matter experts;
- Public Involvement;
- Tank inspection, repair and maintenance procedures;
- Navy and DLA commitment to upgrade tanks as soon as practicable;
- The installation of additional groundwater monitoring wells;
- Compliance with new Federal Underground Storage Tank Regulations;
- Additional actions to reduce risks posed by the facility; and
- Consideration of alternative fuel storage locations.

Many public comments were related to specific aspects of the work that will be performed. Specific technical requirements will be developed under the various tasks in the Statement of Work, and public comments related to these details will be considered during the development of the work plans required under the Administrative Order on Consent.

Why will it take such a long time to implement tank improvements under the Red Hill Administrative Order on Consent?
The primary goal of the Administrative Order on Consent is to ensure the long-term protection of groundwater resources in the vicinity of the Facility. Implementing the right solution for Red Hill is a significant engineering challenge. Because the specific upgrade technology(ies) for the tanks have not been determined at this time it is not possible to include a specific schedule for completion in the AOC, however as a result of the public comments on the proposed AOC, the Navy and DLA have committed to completing all tank upgrades as quickly as practicable. Furthermore, any tanks not upgraded within the 22 year deadline would be emptied of fuel and taken out of service.

Can a double wall be added to the tanks at the Facility now?
In order to ensure the successful operation of such a major upgrade, further studies of the existing tank structure and engineering feasibility studies are necessary. The size and structure of the tanks at the Facility are unique. If not designed and constructed properly, a tank retrofit could increase the risk of future fuel releases.

Is the drinking water in Oahu safe?
Yes, the drinking water is safe for human consumption for both Board of Water Supply customers and military communities. The water for Board of Water Supply customers and military communities is being tested every three months to assure the water is safe. Contamination related to the Facility has never been detected in the Honolulu Board of Water Supply drinking water sources.

What is the likelihood of a future catastrophic release at the Facility?
DOH and EPA believe a catastrophic release from the Facility into groundwater is very unlikely. The tanks are constructed in solid rock and consist of 2.5 to 4 feet thick reinforced concrete and a steel plate. Major earth movement that would rupture a Red Hill tank is highly unlikely due to the construction of the tanks and the relatively low earthquake threat on Oahu. Furthermore, the Navy and DLA are in process of installing oil tight doors in the tunnel system, along with a new fire suppression system.

Additional, more detailed Q&As are included as separate attachment.